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June 10, 2025

**VIA ECF**

Hon. Elizabeth Cowan Wright  
United States District Magistrate Judge, District of Minnesota  
United States District Court  
316 N. Robert Street  
St. Paul, Minnesota 55101

***Re: Compeer Financial, ACA, et al. v. Corporate America Lending, Inc.,  
Case No. 024-cv-01896 (D. Minn. May 21, 2024)***

Dear Judge Wright:

We write as counsel for Defendant Corporate America Lending, Inc. (“Defendant” or “CAL”). In view of the Court’s comments at the June 6, 2025 hearing on Receiver’s Motion Regarding Continued Sealing of Receiver’s First Written Report and for Instructions on Sharing of Documents with Plaintiffs (“Motion”), and without waiving CAL’s arguments and positions submitted in opposition to the Motion, CAL responds to the Court’s June 6, 2025 Minute Entry (Doc. 188) as follows:

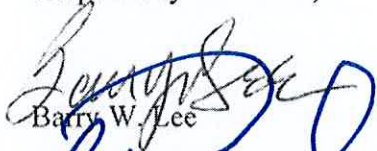

1. CAL agrees to withdraw its objections to the production of the unredacted Receiver’s First Written Report to Plaintiffs and to the disclosure and production of the bank records that the Receiver has obtained in unredacted form to Plaintiffs and the Merits Panel, subject to the Protective Order in place in the underlying arbitration.
2. In view of paragraph 9 of the Court’s Order Appointing Receiver (Doc. 118), CAL does not object to (a) the Receiver interviewing third parties identified in the Receiver’s First Written Report or the bank records that the Receiver has obtained; (b) the Receiver serving discovery on any of such third parties; or (c) to the Receiver requesting bank records from such third parties. The Receiver has previously served discovery on CAL’s bank and requested information from third parties.

[Signatures on next page]

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Respectfully submitted,

  
Barry W. Lee  
  
C. Russell Georgeson

cc: All Counsel of Record (via ECF)